

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

UNITED STATES OF AMERICA,)	Case No. 1:20-cr-77
)	
Plaintiff,)	
)	Judge Timothy S. Black
v.)	
)	
LARRY HOUSEHOLDER,)	
)	
Defendant.)	

**DEFENDANT LARRY HOUSEHOLDER’S
MOTION FOR LEAVE TO FILE UNDER SEAL**

Defendant Larry Householder moves the Court for leave to file a motion (and its accompanying exhibits) under seal. Householder plans to file a motion to suppress certain Title III intercepted communications. In doing so, Householder plans to quote from and reference applications and affidavits that were submitted by the government to obtain wiretap orders. When the government produced these documents in discovery, it designed the documents as “Tier 3” discovery under the Protective Order (Doc. 47). “Tier 3 Discovery Materials are defined as sensitive materials or information that involve, refer, or relate to sensitive investigatory techniques or information the disclosure of which would reveal the sensitive investigative methods used by law enforcement in complex corruption investigations and/or identify or reveal information about other individuals, investigations, or witnesses.” (Doc. 47 at 2). “Discovery Materials attached to Court filings as exhibits shall be filed under seal. Motions or other filings that merely refer to, cite, or quote the Discovery Materials need not be filed under seal, so long as the motions or other filings do not disseminate the identity or probable identity of a confidential witness or third party.” (*Id.* at 5).

Householder thus moves the Court for leave to file his motion and accompanying exhibits under seal. He also moves the Court for a short extension to the motion deadline until the Court rules on this motion.

Dated: February 1, 2022

Respectfully submitted,

/s/ Steven L. Bradley

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Counsel for Defendant Larry Householder

CERTIFICATE OF SERVICE

I certify that the foregoing was electronically filed on February 1, 2022. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Steven L. Bradley

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